

RECEIVED  
U.S. Dept. ARCO

SEP 8 1971

Winston-Salem  
Regional Office

---

**BURLINGTON INDUSTRIES, INCORPORATED**

3330 WEST FRIENDLY AVENUE  
GREENSBORO, NORTH CAROLINA 27420

---

---

Prepared by:

**ENSCI CORPORATION**

1108 Old Thomasville Road  
High Point, North Carolina 27260

**FACILITY NAME:**

BURLINGTON INDUSTRIES, INC.

**FACILITY LOCATION:**

2742 TUCKER STREET EXTENSION  
BURLINGTON, NORTH CAROLINA 27216-0691

**CLIENT CONTACT:**

MR. MIKE ANTONOWICZ

**AUDITORS:**

MR. BRUCE K. BRASWELL, P.G.  
HYDROGEOLOGIST

MR. HENRY M. HAVENER  
SENIOR ENVIRONMENTAL ENGINEER

**REPORT PREPARED BY:**

MR. BRUCE K. BRASWELL

**ASSESSMENT DATE:**

June 24 through July 10, 1991

**REPORT DATE:**

September 3, 1991

## INTRODUCTION

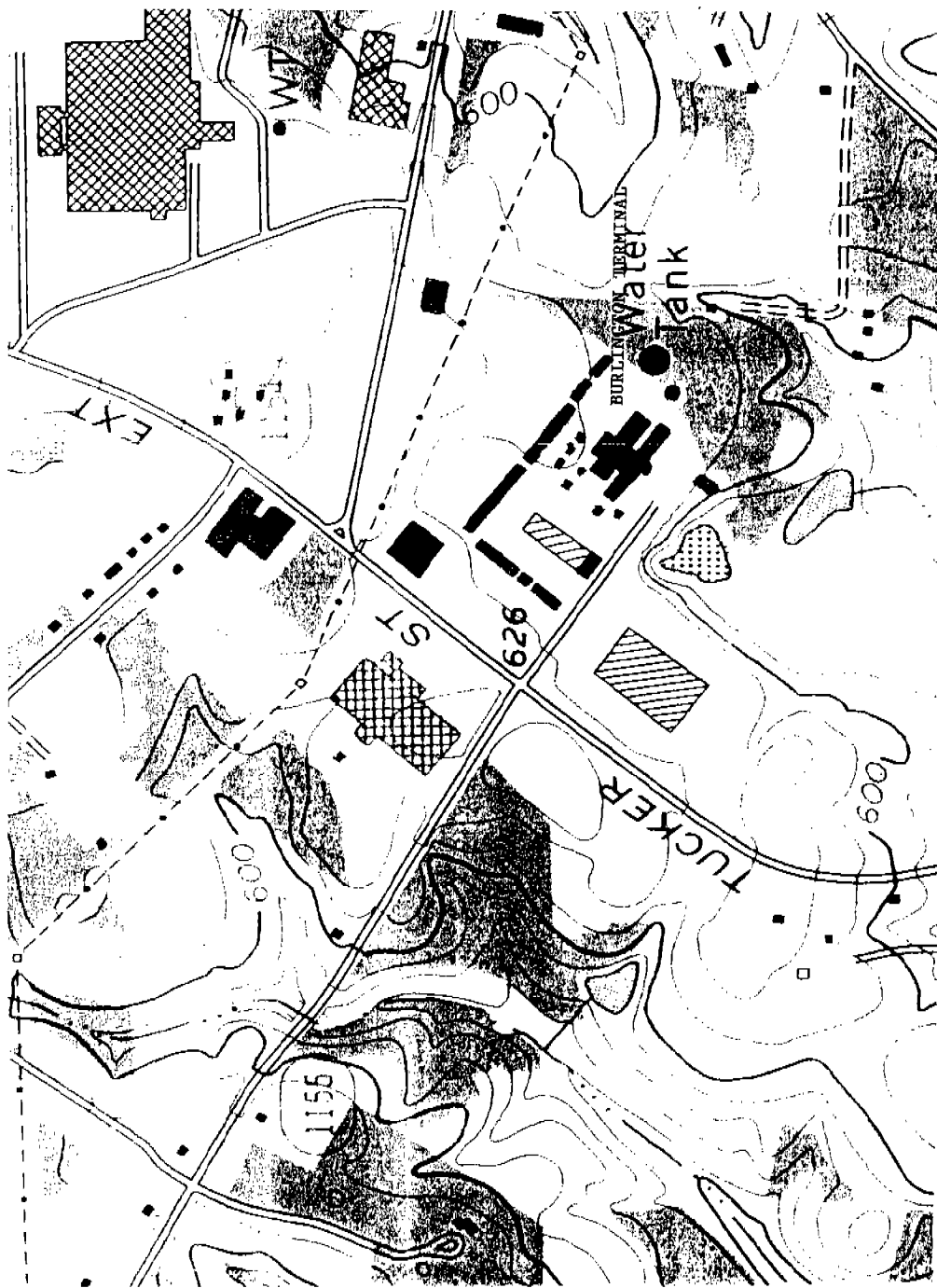
ENSCI Corporation was contracted by Burlington Industries, Incorporated to remove nine (9) underground storage tanks located at the Burlington Industries Tucker Street Extension facility in Burlington, North Carolina (see Location Map). The project involved the removal of nine (9) underground storage tanks (UST's) in accordance with 15 NCAC Subchapter 2N Section .0802 - Permanent Closure and Changes in Service and Section .0803 - Assessing the Site at Closure or Change in Service. ENSCI Corporation notified the Department of Environment, Health and Natural Resources, Division of Environmental Management, Groundwater Section of the intent to permanently close the Burlington Industries UST systems (see Appendix 1). Subsequent to State notification, ENSCI Corporation obtained an Underground Storage Tank removal permit from the Fire Department for the City of Burlington, North Carolina (see Appendix 2).

ENSCI mobilized to the Burlington Industries facility on June 24, 1991 to begin underground storage tank removal operations. At the facility, there were two (2) single UST excavations and one tank farm that possessed seven (7) underground storage tanks (see Figure 1). The seven (7) UST's in the tank farm consisted of three 10,000 gallon diesel fuel tanks, two 6,000 gallon oil tanks, and two 6,000 gallon anti-freeze tanks. As seen in Figure 1, there were two (2) waste oil tanks (one 6,000 thousand gallon and one 4,000 gallon) at the Burlington Industries facility. The waste oil tanks were located on the Northeast side of the truck repair bays. Both waste oil tanks at the Burlington Industries facility were removed by June 26, 1991. Following the removal of the two (2) waste oil tanks, ENSCI Corporation personnel began removal of the seven (7) underground storage tanks in the tank farm area (see Figure 2). All seven of these underground storage tanks were removed by July 1, 1991.

All underground storage tanks were transported to Safeway Tank Disposal, Inc. for proper disposal. At Safeway Tank Disposal, Inc., the tanks are cleaned and then cut into scrap steel using State approved methodology (see Appendix 3).

Subsequent to excavation and removal of the seven (7) underground storage tanks, soil contamination was discovered that related to releases associated with a varsol tank and diesel fuel overspills. Mr. Tom Salley of the DEM was notified of the release by Burlington Industries, Inc. representatives within twenty-four (24) hours of the release discovery. Based on conversations with Burlington representatives, the varsol tank was apparently removed from the Burlington Industries facility at some time in 1984. The actual date of tank removal was not documented by ENSCI Corporation.

ENSCI Corporation personnel excavated contaminated soils July 1 -3 and July 8-10, 1991. As of Wednesday, July 10, 1991, ENSCI Corporation excavated and estimated 3105 cubic yards of contaminated soil from the tank farm area (see Figure 3).



LEGEND	
	HEAVY-DUTY
	MEDIUM-DUTY
	LIGHT-DUTY
	UNIMPROVED DIRT
	US ROUTE
	STATE ROUTE



BURLINGTON INDUSTRIES, INC.  
BURLINGTON, N.C.

LOCATION MAP

SCALE	NTS	DATE	8/91	BY	DJ	FIGURE	
		DATE	8/91	BY	BB	FIGURE	
							REVISION

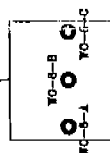
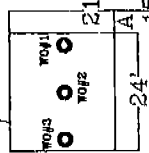
# DETAIL 1

SCALE: 1" = 25'



WASTE OIL TANK #2

WASTE OIL TANKJ#1



CONC. PAD

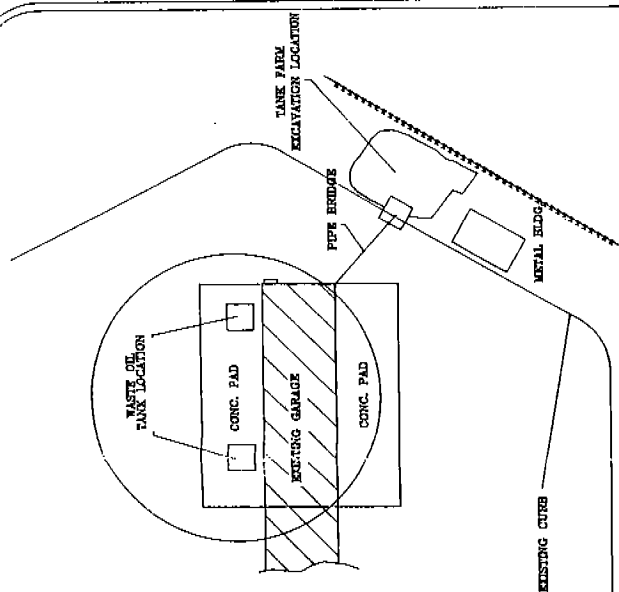
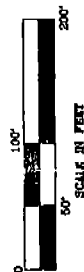
EXISTING GARAGE

CONC. PAD

BAY 1

# SITE LOCATION

SCALE: 1" = 100'



ENVIRONMENTAL SERVICES GROUP  
HIGH POINT, NORTH CAROLINA



BURLINGTON INDUSTRIES, INC.  
BURLINGTON, N.C.

EXCAVATION LOCATIONS (WASTE OIL TANKS)

SCALE: 1" = 100'	DATE: 8/28/91	FIGURE: 1
NO. OF SHEETS: 1	DRAWN BY: DJ	JOB #: 981003A
CHECKED BY: BB		

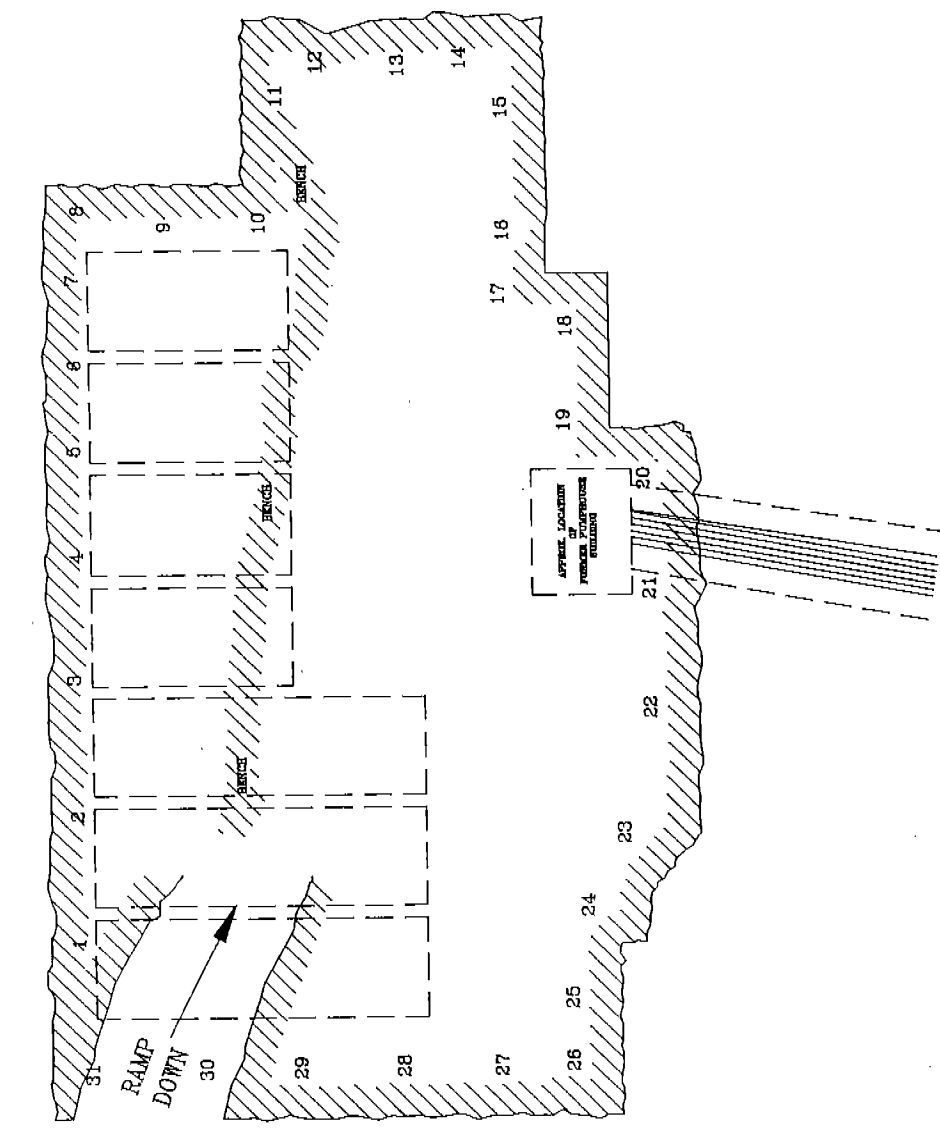
FENCE

FIELD ANALYSIS\*

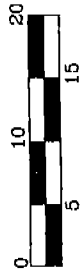
SAMPLE POINT	OVA READING
1	<1 PPM
2	<1 PPM
3	<1 PPM
4	<1 PPM
5	<1 PPM
8	<1 PPM
7	<1 PPM
8	<1 PPM
9	<1 PPM
10	<1 PPM
11	<1 PPM
12	<1 PPM
13	<1 PPM
14	<1 PPM
15	<1 PPM
16	<1 PPM
17	<1 PPM
18	<1 PPM
19	<1 PPM
20	<1 PPM
21	<1 PPM
22	<1 PPM
23	<1 PPM
24	<1 PPM
25	<1 PPM
26	<1 PPM
27	<1 PPM
28	<1 PPM
29	<1 PPM
30	<1 PPM
31	<1 PPM

FENCE

FENCE



SCALE IN FEET



**BURLINGTON INDUSTRIES, INC.**  
BUZZINGTON TERMINAL  
FIELD ANALYSIS SAMPLING POINTS

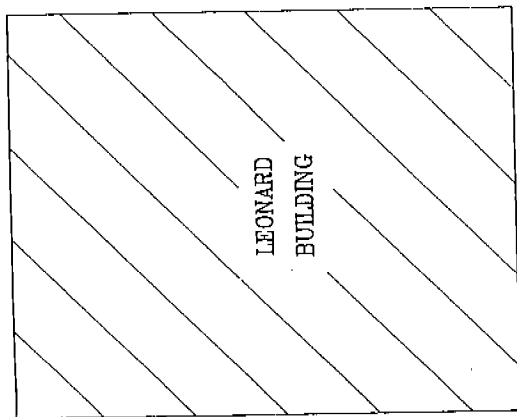
SCALE	DATE	DRY BY	CK BY	FIGURE	JOB #
1"=10'	8/28/81	DJ	BB	2	SR1063A

\* SAMPLING POINTS AT THE EXCAVATION BASE AT THE VARIOUS INDICATED POINTS

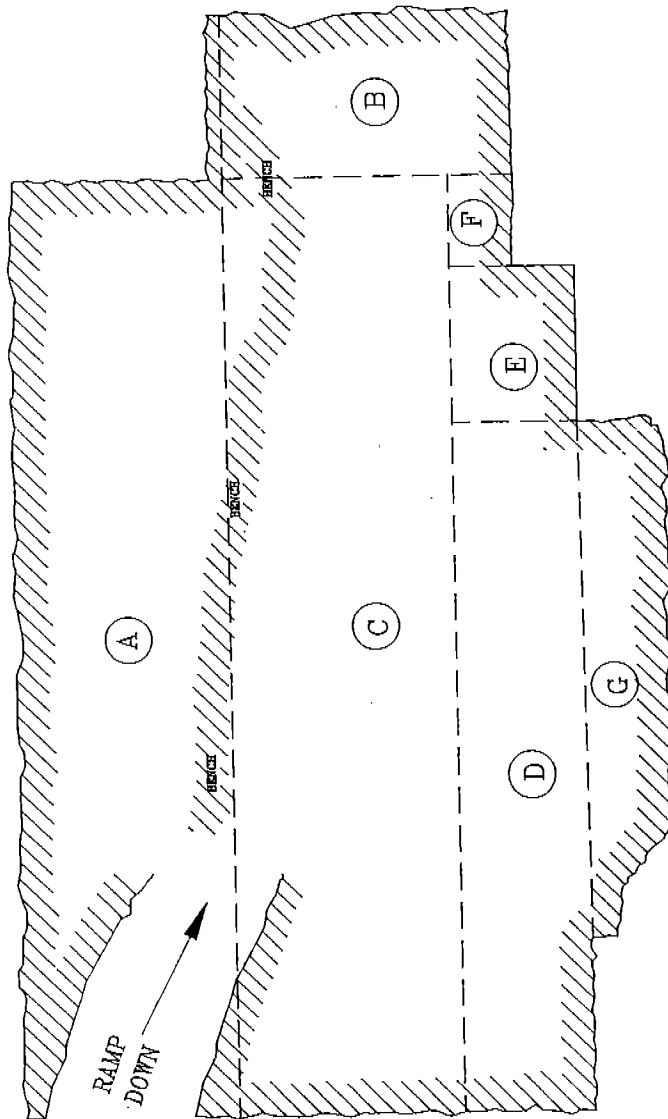
FIGURE 3

FIGURE 3

FIGURE 3



SCALE IN FEET



# TOTAL CUBIC YARDAGE EXCAVATED

TANK FARM EXCAVATION	3105.55 yd <sup>3</sup>
WASTE OIL TANK EXCAVATION	205.83 yd <sup>3</sup>
REFILL LINE TIE-IN EXCAVATION	41.48 yd <sup>3</sup>
	3352.86 yd <sup>3</sup>

3352 yd<sup>3</sup> OF SPACE REQUIRED FILLING FOLLOWING THE EXCAVATION OF CONTAMINATED MATERIALS. COMPACTED FILL MATERIALS ESTIMATED TO BE 1.3 TIMES THE TOTAL VOID SPACE OR 4308.06 yd<sup>3</sup>.

# COMPUTATIONS FOR REMOVED SOILS

TANK NO.	DIMENSIONS	TOTAL (ft <sup>3</sup> )
A	75.5' X 17' X 17'	21,819.5'
B	24' X 9' X 10'	2160.0'
C	75.5' X 17.5' X 24'	31,710.0'
D	56' X 10' X 29'	16,240.0'
E	12.5' X 10' X 27'	3375.0'
F	8.5' X 5' X 17'	722.5'
G	41.5' X 6.5' X 29'	7822.75'
TOTAL (A thru G)		83,849.75 ft <sup>3</sup>
CONVERSION TO CUBIC YARDS		$83,849.75 \text{ ft}^3 \times \frac{1 \text{ yd}^3}{27 \text{ ft}^3} = 3105.55 \text{ yd}^3$



**BURLINGTON INDUSTRIES, INC.**  
RESOLUTION TENDONAL  
CALCULATIONS FOR REMOVED SOILS

SCALE	1"=10'
DATE	4/20/78
BY	ST. BR
FIGURE	3
JOB #	591053A

As seen in Figure 3, the average terminal depth of the tank farm excavation was approximately 29 feet in depth. The deepest portion of the excavation was approximately thirty-five (35) feet in depth. Excavation of contaminated soils in the tank farm area was performed by using a Foxboro Century Model 128 Organic Vapor Analyzer to perform headspace analysis on selected samples. All excavation activity was directed by using this methodology, i.e. performing of headspace analysis on selected soil samples from various parts of the excavation (see Figure 2). Following cessation of excavation activity, ENSCI Corporation representative Mr. Bruce Braswell sampled in the proximity of the locations of the former UST's (see Figure 4).

All representative soil samples acquired from the three (3) underground storage tanks excavations were acquired using a hand-held 4" diameter stainless steel auger. The soil samples were acquired from the various excavation localities indicated in Figures #1 and #2 at approximately 2 feet below the terminal depth of the respective excavations. Between each sample acquisition, the stainless steel auger head and attachments were decontaminated using the following procedure:

1. Wash with soapy water and brush to remove particulate material.
2. Rinse with distilled water.
3. Rinse with 15% nitric acid solution.
4. Rinse with distilled water.
5. Rinse with pesticide grade isopropyl alcohol.
6. Rinse with distilled water.
7. Air dry as long as possible.

All acquired samples were placed in properly prepared amber glass containers and sealed with ceramic lids with teflon liners. All sample jars were labeled, placed in a cooler on ice, and a Chain-of-Custody form was immediately filled out. All samples were maintained at less than 4° centigrade and shipped from ENSCI Corporation's High Point headquarters via express courier service to an EPA approved laboratory.

#### ANALYTICAL TESTING

As seen in Table 1, analysis performed on samples acquired from the two (2) waste oil tank excavations include EPA Method 8240, EPA Method 8270, EPA Method 9071, and 8 RCRA Metals using the TCLP extraction procedure. Analysis performed on samples acquired from waste oil tank excavation No. 2, indicated no contamination (see Appendix 5). EPA Method 9071 analytical results from samples acquired in waste oil tank excavation No. 1 indicated heavy oil fraction constituents at levels as high as 90 parts per million (see Appendix 4).

TABLE 1

WASTE OIL TANK #1 AND TANK #2

POSITIVE ANALYTICAL RESULTS

	Waste Oil Tank Excavation #1			Waste Oil Tank Excavation #2		
	WO-8-A	WO-8-B	WO-8-C	WO#1	WO#2	WO#3
Method 9071 (results in ppm)	32	40	90	<10	<10	<10
<u>TCLP Extraction Procedure</u>						
8 RCRA Metals	.018	NA	.010	.048	NA	.008
Arsenic	.018	NA	.010	.048	NA	.008
Barium	.75	NA	.56	1.81	NA	1.73
Lead	.05	NA	.05	.12	NA	.13
Cadmium	BDL	BDL	BDL	.01	NA	BDL
Chromium	BDL	BDL	BDL	.03	NA	.03
Selenium (results in ppm)	BDL	BDL	BDL	.004	NA	BDL
EPA Method 8240	BDL	NA	BDL	BDL	NA	BDL
EPA Method 8270	BDL	NA	BDL	BDL	NA	BDL

BDL - Below Detection Limits

NA - Not Analyzed

The EPA Method 9071 results of 32 ppm, 40 ppm, and 90 ppm for WO-8-A, WO-8-B, and WO-8-C, respectively, indicates the presence of heavy oil fraction materials at the sampling points indicated in Figure 1. It is the opinion of ENSCI Corporation that the analytical results reported for EPA Method 9071 are spurious. When waste oil tank No. 1 was excavated, there was no apparent release of material associated with the tank and/or associated piping. Screening of excavated materials using an Organic Vapor Analyzer (OVA) also failed to detect any contamination.

As seen in Table 2, analytical results of analyses performed on tanks removed from the tank farm area indicated a clean closure (see Appendix 6). Sampling points for the respective samples are indicated in Figure 4. As mentioned above, the maximum terminal depth of the tank farm excavation was approximately 35 feet below grade. As seen in Figure 3, the various areas and depths of those respective areas have been indicated.

As seen in Figure 2, the piping for the tank farm system was plumbed into a small pump house building seen in the Figure. Following piping to this common point, all piping associated with the underground storage tanks ran above ground and was attached to a Pipe Bridge designed to hold the piping system approximately 15 feet in the air. This above-ground piping system was installed in 1986. This above-ground system replaced an underground system that failed and was abandoned in place after contaminated soils were removed and disposed of at that time (see documentation in Appendix 7).

All contaminated soils were excavated and removed from the vicinity of the tank farm area. Excavation of the abandoned piping system was not possible due to the proximity of the Pipe Bridge supporting the above-ground piping system.

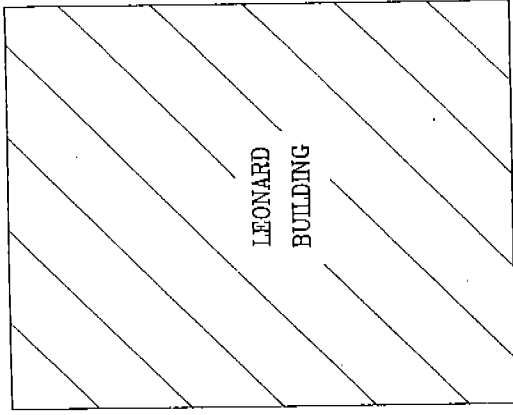
#### MATERIAL STORAGE

All contaminated materials that were excavated from the Burlington Industries facility were stockpiled on plastic on the Northeast side of the Burlington Industries facility in the open grassed area. Materials were placed on plastic and covered with plastic. ENSCI Corporation has initiated an application to the State of North Carolina, on behalf of Burlington Industries, Incorporated, for a Non-Discharge Permit to landfarm the excavated materials on site. The Non-Discharge Permit application was initiated and submitted by ENSCI Corporation on August 22, 1991. It is anticipated that State approval to landfarm these contaminated soils will take approximately 2 to 3 months.

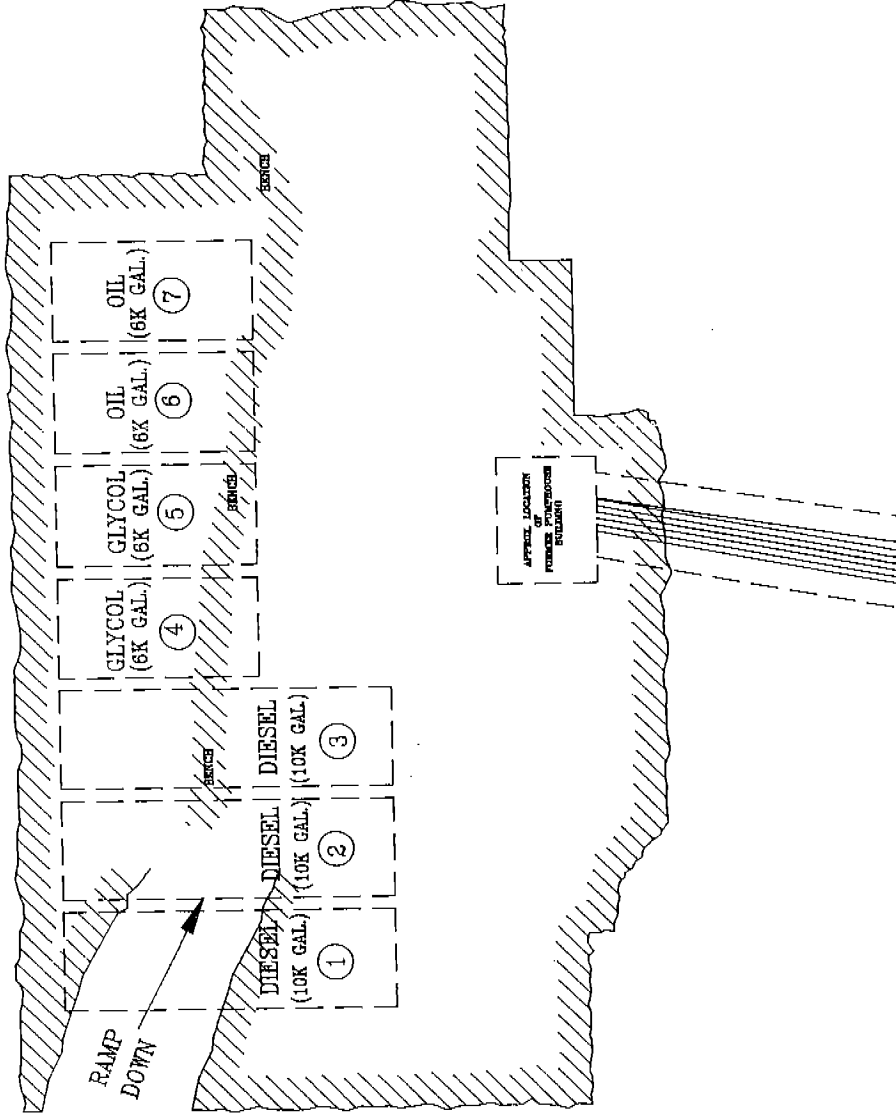
FENCE

FENCE

FENCE



LEONARD  
BUILDING



SCALE IN FEET



**HURLINGTON INDUSTRIES, INC.**

STORAGE TANKS/CONTAINERS/VALVES OF TANKS



SCALE: 1"=10'	DATE: 9/28/93	FIGURE: 4	JOB #: 891083A
APP. BY: DJ	CHK BY: HB		

## CONCLUSION

ENSCI Corporation performed a Closure Assessment of three (3) excavations in which nine (9) underground storage tanks were located at the Burlington Industries Tucker Street Extension facility. Field investigations and observations indicate that a clean closure has been achieved in the tank farm area. These observations are supported by analytical data included in Appendix 6.

Field observations and evaluations indicated a clean closure in the excavation advanced to remove waste oil tank #1. These observations are not, however, supported by analytical data. Based on analytical results generated from samples acquired in the waste oil tank #1 excavation, there may be some soil contamination from waste oil. However, as indicated in the analytical data (see Appendix 4), EPA Method 9071 was the only analytical method that detected any constituents. Based on field observations made by ENSCI Corporation professionals, ENSCI Corporation is of the opinion that the EPA Method 9071 results for waste oil tank #1 are spurious.

Based on observations and field evidence, and supported by analytical data, no contamination is present in the excavation advanced to remove waste oil tank #2. This excavation has been permanently closed and it is free of contamination.

## RECOMMENDATIONS

Due to the proximity of a Pipe Bridge over the old underground piping system leading away from the tank farm area, it was not possible for ENSCI Corporation personnel to excavate the old piping system. As this piping system was abandoned and remediated in 1986 due to the result of a small release of motor oil (less than 100 gallons), no additional remedial activity is recommended for this area.

If I can be of assistance, or answer any questions, please do not hesitate to call.

Sincerely yours,

ENSCI CORPORATION

*Bruce K. Braswell*

Bruce K. Braswell, P. G.  
Hydrogeologist

BKB/few

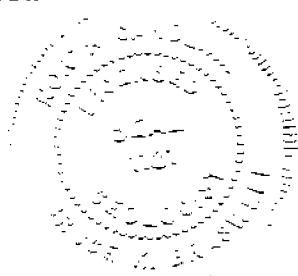


TABLE 2

TANK FARM EXCAVATION

POSITIVE ANALYTICAL RESULTS

	DIESEL FUEL TANK #1			DIESEL FUEL TANK #2			DIESEL FUEL TANK #3		
	D1-1	D1-2	D1-3	D2-1	D2-2	D2-3	D3-1	D3-2	D3-3
EPA METHOD 3550	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL	BDL

GLYCOL TANKS

	GLYCOL TANK #1	
	G1-1	G1-2
GLYCOL BY GC	BDL	BDL

GLYCOL TANK #2	
G2-1	G2-2
BDL	BDL

OIL TANKS

	OIL TANK #1	
	01-1	01-2
EPA METHOD 9071	BDL	BDL

OIL TANK #2	
02-1	02-2
BDL	BDL

BDL - BELOW DETECTION LIMITS

APPENDIX 1

UNDERGROUND STORAGE TANK  
PERMANENT CLOSURE NOTICE

AND

RECEIPT OF TANK CLOSURE NOTICE

# Notice of Intent to Permanently Close Underground Storage Tank(s)

FOR  
TANKS  
IN  
NC

North Carolina - Department of Environment, Health, & Natural Resources  
Division of Environmental Management - Groundwater Section - U.S.T.  
P.O. Box 27687  
Raleigh, NC 27611 (919)733-8303

State Use Only  
I. D. Number \_\_\_\_\_  
Date Received \_\_\_\_\_

## INSTRUCTIONS

Please complete and return thirty (30) days prior to permanently closing tank(s).

### I. OWNERSHIP OF TANK(S)

### II. LOCATION OF TANK(S)

Tank Owner Name: Burlington Industries, Inc. Facility Name or Company: B.I.-Burlington Facility  
(Corporation, Individual, Public Agency, or Other Entry)  
Street Address: P.O. Box 21207 Street Address or State Road: Tucker Street Ext.  
County: Guilford County: Alamance County  
City: Greensboro State: NC Zip Code: 27420 City: Burlington State: NC Zip Code: \_\_\_\_\_  
Telephone Number (Area Code): (919) 379-4688 Telephone Number (Area Code): (919) 228-2250

### Contact Person

Name: Mike Antonowicz Job Title: Staff Mech. Eng. Telephone Number: (919) 379-4688

### TANK REMOVAL OR CLOSURE IN PLACE

1. Contact Local Fire Marshall.
2. Plan the Closure Event.
3. Make Site Soil Assessments.
4. Remove Tanks or Close in Place in a Safe and Secure Manner Per API Pubs. "2015 Cleaning" and "1604 Removal & Disposal".
5. Provide a sketch Locating Tanks and Soil Tests.
6. Keep Records for 3 Years.

### TANK(S) CLOSURE OPERATIONS TO BE PERFORMED BY:

(Contractor) Name: ENSCI Corporation  
Address: 1108 Old Thomasville Rd. State: NC Zip Code: 27260  
High Point, NC  
Contact: Henry M. Havener Phone: 919/883-7505

### TANK(S) SCHEDULED FOR CLOSURE OR TO BE CLOSED

TANK NUMBER	TANK ID #	TANK CAPACITY	LAST CONTENTS	CLOSURE METHOD	
				Remove	Close in Ground
Tank 1		10,000	Diesel	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 2		10,000	Diesel	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 3		10,000	Motor Oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 4		6,000	Gear Oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 5		6,000	Rotella Oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 6		6,000	Anti Freeze	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 7		6,000	Anti Freeze	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 8		4,000	Waste Oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Tank 9		6,000	Waste Oil	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Name and Official title of Owner's Authorized Representative

Henry M. Havener

\*Scheduled Removal Date: 6-24-91

Signature: 

Date Submitted: 6-24-91

\*If scheduled removal date changes, Forty-eight hours verbal notice of tank removal is required.

GW/UST-3

White Copy - Owner  
Yellow Copy - Regional Office

Blue Copy - Central Office  
Pink Copy - Central Files



State of North Carolina  
Department of Environment, Health, and Natural Resources  
Winston-Salem Regional Office

James C. Martin, Governor  
William W. Cobey, Jr., Secretary

Margaret Plemmons Foster  
Regional Manager

DIVISION OF ENVIRONMENTAL MANAGEMENT  
GROUNDWATER SECTION

6/24/91

Burlington Industries  
P.O. Box 27207  
Wilmington, NC  
27402

Dear SIRS

This letter is to acknowledge your Notification of Tank Closure as received 6/24/91 and filed as Burlington INDUSTRIES - TUG ST. All future correspondence must contain the file name as well as address and county in the subject to ensure its receipt into our filing system.

The results of the required assessment (NCAC Title 15A Subchapter 2N Section .0803 and 40 CFR Part 280.72) should be submitted to this office no later than thirty (30) days after the tank is closed. If there is evidence of a release or suspected release, it must be reported within twenty-four (24) hours.

Also, please remember that to permanently close a tank, owners and operators must empty and clean it by removing all liquids and accumulated sludges as required under 15A 2N .0802 and 40 CFR 280.71(b).

Groundwater Section staff will be conducting random site visits to ensure that underground storage tank closures are conducted as required in 15A 2N .0802 and .0803 and 40 CFR 280.71 and 280.72. Any violations documented may be submitted for enforcement action.

Enclosed is an attachment that is to be used for the information required for closure assessment. You may contact me at the letterhead address or telephone number if you have any questions concerning these requirements.

Sincerely,

245

Thomas A. Salley  
Hydrogeological Technician

TAS/ahl  
Enclosure  
cc: WSRO

APPENDIX 2

CITY OF BURLINGTON, NORTH CAROLINA

FIRE DEPARTMENT PERMIT

**FIRE DEPARTMENT**  
**CITY OF BURLINGTON, N. C.**  
**PERMIT**

**TO WHOM IT MAY CONCERN:**

By virtue of the provisions of the Fire Prevention Regulations of the City of BURLINGTON EN SCI  
(Name of Concern)  
No. 1108 Street, THOMASVILLE Rd conducting a TANK REMOVAL SERVICE  
(Business)  
HIGH POINT, N.C. 27260

having made application in due form, and as the conditions, surroundings and arrangements are, in my opinion, such that the intent of the

Regulations can be observed, authority is hereby given and this PERMIT is GRANTED for REMOVAL of

3-10000 5-6000 1-4000 UST's

JUNE 24, 1991  
(Date)

This PERMIT is issued and accepted on condition that all Regulations now adopted, or that may hereafter be adopted, shall be complied with.

This permit does not take the place of any  
License required by law and is not transferable.  
Any change in the use or occupancy of premises  
shall require a new permit.

Carol Harbison Dist Chief  
Chief of The Bureau of Fire Prevention

THIS PERMIT MUST AT ALL TIMES BE KEPT POSTED ON THE PREMISES MENTIONED ABOVE

APPENDIX 3

SAFEWAY TANK DISPOSAL, INC.

RECEIVING REPORT

AND

CERTIFICATE OF TANK DISPOSAL

# Safeway Tank Disposal, Inc.

Page 1 of 1

## RECEIVING REPORT

From: ENSCI Corp.  
High Point NC

Received by: Bruce D. H. - J  
SAFEWAY TANK DISPOSAL, INC.

Transported by: ENSCI

Tank Disposal Number	Size	Weight	Product	Date Received	Origin
4494	10,000	8335	<del>Motor Oil</del>	7/2/91	Durington Ind. Burlington NC
4497	10,000	8335	D.F.	"	"
4508	4,000	3650	WO	7/5/91	↓
4509	10,000	8335	D.F.	7/5/91	
4510	6000	5460	Clean & Empty	7/5/91	
4511	6000	5460	OIL	7/5/91	
4512	6000	5460	Gear Oil	7/5/91	
4513	6000	5460	Clean & Empty	7/5/91	
4548	4,000	3640	WO	7/15/91	↓

Safeway Tank Disposal, Inc. accepts the liability for the tank(s) and contents on this report. The tank(s) and contents must be a petroleum product. If at any time the tanks are found to contain any product other than a petroleum product SAFEWAY TANK DISPOSAL, INC. has the right to refuse disposal or negotiate a price for disposal. Customer will be liable for any clean-up or other cost resulting from contamination by a substance other than a petroleum product.

Safeway Tank Disposal, Inc. agrees to dispose of petroleum tanks and contents in accordance with local, state, and federal regulation. Certificate of Disposal to follow.

Bruce D. H. - J  
SAFEWAY TANK DISPOSAL, INC.

## CERTIFICATE OF TANK DISPOSAL

Customer

Ensci Corp.  
1108 Old Thomasville Rd.  
High Point, NC 27260

Date July 26, 1991Transported by: Ensci

Tank Disposal Number	Size	Weight	Product	Residue Amount	Origin
4494	10,000	8335#	Motor Oil	85 gal	Burlington Ind. Burlington, NC.
4497	10,000	8335#	D. Fuel	90 gal	
4508	4,000	3640#	Waste Oil	150 gal	
4509	10,000	8335#	D. Fuel	125 gal	
4510	6,000	5460#	Clean + Empty	0	
4511	6,000	5460#	Motor Oil	60 gal	
4512	6,000	5460#	Gear Oil	130 gal	
4513	6,000	5460#	Clean + Empty	0	
4548	4,000	3640#	Waste Oil	0	
Total Residue				640 gal	

Tanks were disposed in accordance with API 1604, 1987 Removal and Disposal of Used Underground Petroleum Storage Tanks. Residue was disposed in accordance with U.S. EPA Regulations by licensed subcontractor. Lead free scrap steel was recycled by United Metal Recyclers on 7/10/12/15/19/91.

Bruce A. Gandy  
SAFEWAY TANK DISPOSAL, INC.

APPENDIX 4

WASTE OIL TANK #1  
ANALYTICAL RESULTS

**LAW & COMPANY**  
*Consulting and Analytical Chemists*

ESTABLISHED 1903

Main Office  
1711 Castle Street  
P.O. Box 629  
Wilmington, N.C. 28402

REPORT DATE: 8-07-91

919-762-7082 919-762-8956  
FAX 919-762-8785

ENSCI INC.  
1108 OLD THOMASVILLE ROAD  
HIGH POINT, N.C. 27263

DATE RECEIVED: 7-02-91  
DATE COLLECTED: 6-26-91  
COLLECTED BY: CUSTOMER  
LAB I.D. # EW 7960

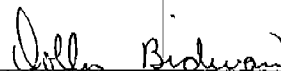
PO# 30478

SAMPLE DESCRIPTION: SOIL - BURLINGTON INDUSTRIES

TESTS/SAMPLES	UNITS	WO-8-A	WO-8-B	WO-8-C
HEAVY OIL (EPA METHOD #9071)	PPM	32	40	90
TCLP - METALS:				
ARSENIC	PPM	0.018	---	0.010
BARIUM	PPM	0.75	---	0.56
CADMIUM	PPM	<0.01	---	<0.01
CHROMIUM	PPM	<0.02	---	<0.02
LEAD	PPM	0.05	---	0.05
MERCURY	PPM	<0.002	---	<0.002
SELENIUM	PPM	<0.003	---	<0.003
SILVER	PPM	<0.01	---	<0.01

METHOD # 8240 - PURGEABLE HALOCARBONS  
METHOD # 8270 - BASE NEUTRAL/ACIDS

SEE ATTACHED REPORTS.  
SEE ATTACHED REPORTS.

  
LABORATORY DIRECTOR

LAW & COMPANY  
PO #2523  
50946-47  
JULY 26, 1991

-2-

PURGEABLE HALOCARBONS  
METHOD 8240

CLIENT ID: WO8A

DATE ANALYZED: 7-16-91

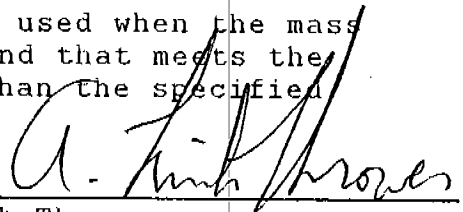
PARAMETER	DETECTION LIMIT (ug/kg)	RESULT (ug/kg)
BENZENE	5.0	BDL
BROMODICHLOROMETHANE	5.0	BDL
BROMOFORM	5.0	BDL
BROMOMETHANE	5.0	BDL
CARBON TETRACHLORIDE	5.0	BDL
CHLOROBENZENE	5.0	BDL
CHLOROETHANE	10.0	BDL
2-CHLOROETHYL VINYL ETHER	10.0	BDL
CHLOROFORM	5.0	BDL
DIBROMOCHLOROMETHANE	5.0	BDL
1,2-DICHLOROBENZENE	5.0	BDL
1,3-DICHLOROBENZENE	5.0	BDL
1,4-DICHLOROBENZENE	5.0	BDL
1,1-DICHLOROETHANE	5.0	BDL
1,2-DICHLOROETHANE	5.0	BDL
1,1-DICHLOROETHENE	5.0	BDL
TRANS-1,2-DICHLOROETHENE	5.0	BDL
1,2-DICHLOROPROPANE	5.0	BDL
CIS-1,3-DICHLOROPROPENE	5.0	BDL
TRANS-1,3-DICHLOROPROPENE	5.0	BDL
ETHYL BENZENE	5.0	BDL
METHYLENE CHLORIDE	5.0	BDL
1,1,1,2-TETRACHLOROETHANE	5.0	BDL
TETRACHLOROETHENE	5.0	BDL
TOLUENE	5.0	BDL
1,1,1-TRICHLOROETHANE	5.0	BDL
1,1,2-TRICHLOROETHANE	5.0	BDL
TRICHLOROETHENE	5.0	BDL
TRICHLOROFLUOROMETHANE	5.0	BDL
VINYL CHLORIDE	10.0	BDL
XYLENES	5.0	BDL
INTERNAL STANDARDS		
1-CHLORO-2-BROMO-PROPANE		98%
FLOUROBENZENE		85%

BDL - BELOW DETECTION LIMIT

"TEST METHODS FOR EVALUATING SOLID WASTES", SW846, VOLUME 3,  
SEPTEMBER, 1986.

J - Indicates an estimated value. This flag is used when the mass  
spectral data indicated the presence of a compound that meets the  
identification criteria but the result is less than the specified  
detection limit.

Certified By:

  
Link Thrower

7-26-91A

LAW & COMPANY  
PO #2523  
50946-47  
JULY 26, 1991

-3-

PURGEABLE HALOCARBONS  
METHOD 8240

CLIENT ID: WO8C

DATE ANALYZED: 7-16-91

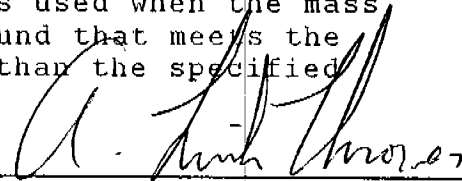
PARAMETER	DETECTION LIMIT (ug/kg)	RESULT (ug/kg)
BENZENE	5.0	BDL
BROMODICHLOROMETHANE	5.0	BDL
BROMOFORM	5.0	BDL
BROMOMETHANE	5.0	BDL
CARBON TETRACHLORIDE	5.0	BDL
CHLOROBENZENE	5.0	BDL
CHLOROETHANE	10.0	BDL
2-CHLOROETHYL VINYL ETHER	10.0	BDL
CHLOROFORM	5.0	BDL
DIBROMOCHLOROMETHANE	5.0	BDL
1,2-DICHLOROBENZENE	5.0	BDL
1,3-DICHLOROBENZENE	5.0	BDL
1,4-DICHLOROBENZENE	5.0	BDL
1,1-DICHLOROETHANE	5.0	BDL
1,2-DICHLOROETHANE	5.0	BDL
1,1-DICHLOROETHENE	5.0	BDL
TRANS-1,2-DICHLOROETHENE	5.0	BDL
1,2-DICHLOROPROPANE	5.0	BDL
CIS-1,3-DICHLOROPROPENE	5.0	BDL
TRANS-1,3-DICHLOROPROPENE	5.0	BDL
ETHYL BENZENE	5.0	BDL
METHYLENE CHLORIDE	5.0	BDL
1,1,1,2-TETRACHLOROETHANE	5.0	BDL
TETRACHLOROETHENE	5.0	BDL
TOLUENE	5.0	BDL
1,1,1-TRICHLOROETHANE	5.0	BDL
1,1,2-TRICHLOROETHANE	5.0	BDL
TRICHLOROETHENE	5.0	BDL
TRICHLOROFLUOROMETHANE	5.0	BDL
VINYL CHLORIDE	10.0	BDL
XYLENES	5.0	BDL
INTERNAL STANDARDS		
1-CHLORO-2-BROMO-PROPANE		104%
FLOUROBENZENE		94%

BDL - BELOW DETECTION LIMIT

"TEST METHODS FOR EVALUATING SOLID WASTES", SW846, VOLUME 3,  
SEPTEMBER, 1986.

J - Indicates an estimated value. This flag is used when the mass  
spectral data indicated the presence of a compound that meets the  
identification criteria but the result is less than the specified  
detection limit.

Certified By:

  
Link Thrower

7-26-91A

LAW & COMPANY  
PO #2523  
50946-47  
JULY 26, 1991

-4-

BASE NEUTRAL/ACIDS  
METHOD 8270

CLIENT ID: WO8A

DATE EXTRACTED: 7-17-91  
DATE ANALYZED: 7-17-91

BASE NEUTRAL FRACTION

PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
ACENAPHTHENE	10	BDL
ACENAPHTHYLENE	10	BDL
ANTRACENE	10	BDL
BENZO(A)ANTHRACENE	10	BDL
BENZO(B)FLUORANTHENE	10	BDL
BENZO(K)FLUORANTHENE	10	BDL
BENZO(GHI)PERYLENE	10	BDL
BIS(2-CHLOROETHYL)ETHER	10	BDL
BIS(2-CHLOROETHOXY)METHANE	10	BDL
BIS(2-ETHYLHEXYL)PHTHALATE	10	BDL
BIS(2-CHLOROISOPROPYL)ETHER	10	BDL
4-BROMOPHENYL PHENYL ETHER	10	BDL
BUTYL BENZYL PHTHALATE	10	BDL
2-CHLORONAPHTHALENE	10	BDL
4-CHLOROPHENYL PHENYL ETHER	10	BDL
CHRYSENE	10	BDL
DIBENZO(AH)ANTHRACENE	10	BDL
DI-N-BUTYLPHTHALATE	10	BDL
1,2-DICHLOROBENZENE	10	BDL
1,3-DICHLOROBENZENE	10	BDL
1,4-DICHLOROBENZENE	10	BDL
3,3'-DICHLOROBENZIDINE	10	BDL
DIETHYL PHTHALATE	10	BDL
DIMETHYL PHTHALATE	10	BDL
2,4-DINITROTOLUENE	10	BDL
2,6-DINITROTOLUENE	10	BDL
DI-N-OCTYLPHTHALATE	10	BDL
FLUORANTHENE	10	BDL
FLUORENE	10	BDL
HEXACHLOROBENZENE	10	BDL
HEXACHLOROBUTADIENE	10	BDL
HEXACHLOROETHANE	10	BDL
IDENO(1,2,3-CD)PYRENE	10	BDL
ISOPHORONE	10	BDL
2-METHYLNAPHTHALENE	10	BDL
NAPHTHALENE	10	BDL
NITROBENZENE	10	BDL
N-NITROSODI-N-PROPYLAMINE	10	BDL
PHENANTHRENE	10	BDL
PYRENE	10	BDL
1,2,4-TRICHLOROBENZENE	10	BDL

LAW & COMPANY  
PO #2523  
50946-47  
JULY 26, 1991

-5-

BASE NEUTRAL/ACIDS (con't)

CLIENT ID: WO8A

DATE EXTRACTED: 7-17-91

DATE ANALYZED: 7-17-91

ACIDS FRACTION

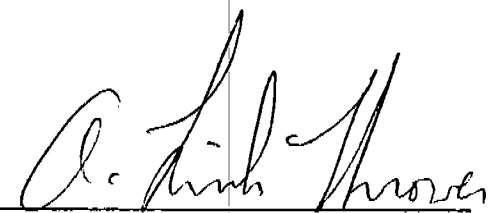
PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
4-CHLORO-3-METHYLPHENOL	10	BDL
2-CHLOROPHENOL	10	BDL
2,4-DICHLOROPHENOL	10	BDL
2,4-DIMETHYLPHENOL	10	BDL
2,4-DINITROPHENOL	50	BDL
2-METHYL-4,6-DINITROPHENOL	50	BDL
2-NITROPHENOL	10	BDL
4-NITROPHENOL	50	BDL
PENTACHLOROPHENOL	50	BDL
PHENOL	10	BDL
2,4,6-TRICHLOROPHENOL	10	BDL

BDL - BELOW DETECTION LIMIT

"TEST METHODS FOR EVALUATING SOLID WASTES", SW846, VOLUME 3  
SEPTEMBER 1986.

J - Indicates an estimated value. This flag is used when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit.

Certified By:

  
LINK THROWER

7-26-91A

LAW & COMPANY  
PO #2523  
50946-47  
JULY 26, 1991

-6-

BASE NEUTRAL/ACIDS  
METHOD 8270

CLIENT ID: W08C

DATE EXTRACTED: 7-17-91  
DATE ANALYZED: 7-18-91

BASE NEUTRAL FRACTION

PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
ACENAPHTHENE	200	BDL
ACENAPHTHYLENE	200	BDL
ANTRACENE	200	BDL
BENZO(A)ANTHRACENE	200	BDL
BENZO(B)FLUORANTHENE	200	BDL
BENZO(K)FLUORANTHENE	200	BDL
BENZO(GHI)PERYLENE	200	BDL
BIS(2-CHLOROETHYL)ETHER	200	BDL
BIS(2-CHLOROETHOXY)METHANE	200	BDL
BIS(2-ETHYLHEXYL)PHTHALATE	200	BDL
BIS(2-CHLOROISOPROPYL)ETHER	200	BDL
4-BROMOPHENYL PHENYL ETHER	200	BDL
BUTYL BENZYL PHTHALATE	200	BDL
2-CHLORONAPHTHALENE	200	BDL
4-CHLOROPHENYL PHENYL ETHER	200	BDL
CHRYSENE	200	BDL
DIBENZO(AH)ANTHRACENE	200	BDL
DI-N-BUTYLPHTHALATE	200	BDL
1,2-DICHLOROBENZENE	200	BDL
1,3-DICHLOROBENZENE	200	BDL
1,4-DICHLOROBENZENE	200	BDL
3,3'-DICHLOROBENZIDINE	200	BDL
DIETHYL PHTHALATE	200	BDL
DIMETHYL PHTHALATE	200	BDL
2,4-DINITROTOLUENE	200	BDL
2,6-DINITROTOLUENE	200	BDL
DI-N-OCTYLPHTHALATE	200	BDL
FLUORANTHENE	200	BDL
FLUORENE	200	BDL
HEXACHLOROBENZENE	200	BDL
HEXACHLOROBUTADIENE	200	BDL
HEXACHLOROETHANE	200	BDL
IDENO(1,2,3-CD)PYRENE	200	BDL
ISOPHORONE	200	BDL
2-METHYLNAPHTHALENE	200	BDL
NAPHTHALENE	200	BDL
NITROBENZENE	200	BDL
N-NITROSODI-N-PROPYLAMINE	200	BDL
PHENANTHRENE	200	BDL
PYRENE	200	BDL
1,2,4-TRICHLOROBENZENE	200	BDL

LAW & COMPANY  
PO #2523  
50946-47  
JULY 26, 1991

-7-

BASE NEUTRAL/ACIDS (con't)

CLIENT ID: W08C

DATE EXTRACTED: 7-17-91

DATE ANALYZED: 7-18-91

ACIDS FRACTION

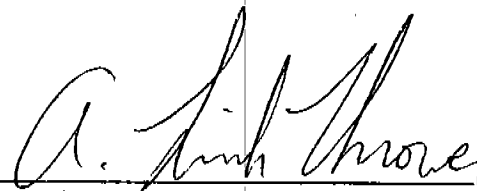
PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
4-CHLORO-3-METHYLPHENOL	200	BDL
2-CHLOROPHENOL	200	BDL
2,4-DICHLOROPHENOL	200	BDL
2,4-DIMETHYLPHENOL	200	BDL
2,4-DINITROPHENOL	1000	BDL
2-METHYL-4,6-DINITROPHENOL	1000	BDL
2-NITROPHENOL	200	BDL
4-NITROPHENOL	1000	BDL
PENTACHLOROPHENOL	1000	BDL
PHENOL	200	BDL
2,4,6-TRICHLOROPHENOL	200	BDL

BDL - BELOW DETECTION LIMIT

"TEST METHODS FOR EVALUATING SOLID WASTES", SW846, VOLUME 3  
SEPTEMBER 1986.

J - Indicates an estimated value. This flag is used when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit.

Certified By:

  
LINK THROWER

7-26-91A

1711 Castle Street • P.O. Box 629 • Wilmington, North Carolina 28402  
Telephones (919) 762-7082 or (919) 762-8956  
FAX (919) 762-8785

CUSTOMER: Law & Company PROJECT ID: W08A & W08C

[illegible]

1711 Castle Street • P.O. Box 629 • Wilmington, North Carolina 28402  
Telephones (919) 762-7082 or (919) 762-8956  
FAX (919) 762-8785

PO# 30478

PROJECT ID: BURLINGTON INDUSTRIES

[illegible]

**APPENDIX 5**

**WASTE OIL TANK #2**

**ANALYTICAL RESULTS**

**LAW & COMPANY**  
*Consulting and Analytical Chemists*

ESTABLISHED 1903

Main Office  
1711 Castle Street  
P.O. Box 629  
Wilmington, N.C. 28402

REPORT DATE: 8-22-91

919-762-7082 919-762-8956  
FAX 919-762-8785

ENSCI INC.  
1108 OLD THOMASVILLE ROAD  
HIGH POINT, N.C. 27263

RECEIVED DATE: 7-10-91  
DATE COLLECTED: 7-08-91  
COLLECTED BY: B. BRASWELL  
LAB I.D. # EW 8159

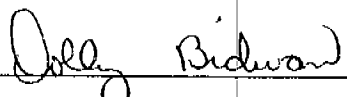
PO# 30478

SAMPLE DESCRIPTION: SOIL - BURLINGTON INDUSTRIES

TESTS/SAMPLES	UNITS	WO# 1	WO# 2	WO# 3
HEAVY OIL	PPM	< 10*	< 10*	< 10*
TCLP - METALS:				
ARSENIC	PPM	0.048	---	0.008
BARIUM	PPM	1.81	----	1.73
CADMIUM	PPM	0.01	----	<0.01
CHROMIUM	PPM	0.03	---	0.03
LEAD	PPM	0.12	---	0.13
MERCURY	PPM	<0.002	---	<0.002
SELENIUM	PPM	0.004	---	<0.003
SILVER	PPM	<0.01	----	<0.01
EPA METHOD # 8240 PURGEABLE HALOCARBONS		SEE ATTACHED	----	SEE ATTACHED
EPA METHOD # 8270 GAS NEUTRALS/ACIDS		SEE ATTACHED	----	SEE ATTACHED

EPA # 9071 HEAVY OIL  
DETECTION LIMITS = 10 PPM

\* BELOW DETECTION LIMITS

  
LABORATORY DIRECTOR

LAW & COMPANY  
W0-1/W0-3  
51184-85  
AUGUST 16, 1991

-2-

PURGEABLE HALOCARBONS

METHOD 8240  
DATE ANALYZED: 7-23-91  
CLIENT ID: W0-1  
CET SAMPLE: 51184  
DILUTION FACTOR:1

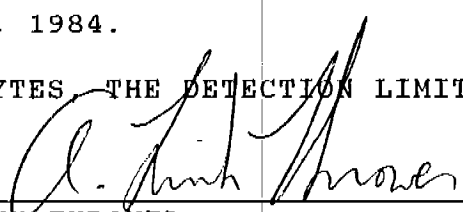
PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
BENZENE	5.0	BDL
BROMODICHLOROMETHANE	5.0	BDL
BROMOFORM	5.0	BDL
BROMOMETHANE	5.0	BDL
CARBON TETRACHLORIDE	5.0	BDL
CHLOROBENZENE	5.0	BDL
CHLOROETHANE	10.0	BDL
2-CHLOROETHYL VINYL ETHER	10.0	BDL
CHLOROFORM	5.0	BDL
DIBROMOCHLOROMETHANE	5.0	BDL
1,2-DICHLOROBENZENE	5.0	BDL
1,3-DICHLOROBENZENE	5.0	BDL
1,4-DICHLOROBENZENE	5.0	BDL
1,1-DICHLOROETHANE	5.0	BDL
1,2-DICHLOROETHANE	5.0	BDL
1,1-DICHLOROETHENE	5.0	BDL
TRANS-1,2-DICHLOROETHENE	5.0	BDL
1,2-DICHLOROPROPANE	5.0	BDL
CIS-1,3-DICHLOROPROPENE	5.0	BDL
TRANS-1,3-DICHLOROPROPENE	5.0	BDL
ETHYL BENZENE	5.0	BDL
METHYLENE CHLORIDE	5.0	BDL
1,1,2,2-TETRACHLOROETHANE	5.0	BDL
TETRACHLOROETHENE	5.0	BDL
TOLUENE	5.0	BDL
1,1,1-TRICHLOROETHANE	5.0	BDL
1,1,2-TRICHLOROETHANE	5.0	BDL
TRICHLOROETHENE	5.0	BDL
TRICHLOROFLUOROMETHANE	5.0	BDL
VINYL CHLORIDE	10.0	BDL
XYLENES	5.0	BDL
INTERNAL STANDARD RECOVERY		
FLUOROBENZENE		76%
1-CHLORO,2-BROMO PROPANE		95%

BDL - BELOW DETECTION LIMIT.

FEDERAL REGISTER, VOL 49, NO. 209, OCTOBER 26, 1984.

IF A DILUTION IS NEEDED TO DETERMINE THE ANALYTES, THE DETECTION LIMIT  
HAS BEEN INCREASED BY THAT DILUTION FACTOR.

CERTIFIED BY

  
LINK THROWER

LAW & COMPANY  
W0-1/W0-3  
51184-85  
AUGUST 16, 1991

-3-

PURGEABLE HALOCARBONS

METHOD 8240  
DATE ANALYZED: 7-23-91  
CLIENT ID: W0-3  
CET SAMPLE: 51185  
DILUTION FACTOR: 1

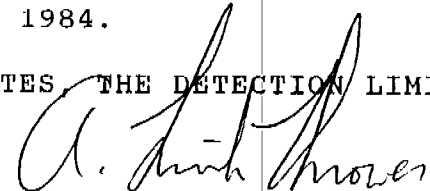
PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
BENZENE	5.0	BDL
BROMODICHLOROMETHANE	5.0	BDL
BROMOFORM	5.0	BDL
BROMOMETHANE	5.0	BDL
CARBON TETRACHLORIDE	5.0	BDL
CHLOROBENZENE	5.0	BDL
CHLOROETHANE	10.0	BDL
2-CHLOROETHYL VINYL ETHER	10.0	BDL
CHLOROFORM	5.0	BDL
DIBROMOCHLOROMETHANE	5.0	BDL
1,2-DICHLOROBENZENE	5.0	BDL
1,3-DICHLOROBENZENE	5.0	BDL
1,4-DICHLOROBENZENE	5.0	BDL
1,1-DICHLOROETHANE	5.0	BDL
1,2-DICHLOROETHANE	5.0	BDL
1,1-DICHLOROETHENE	5.0	BDL
TRANS-1,2-DICHLOROETHENE	5.0	BDL
1,2-DICHLOROPROPANE	5.0	BDL
CIS-1,3-DICHLOROPROPENE	5.0	BDL
TRANS-1,3-DICHLOROPROPENE	5.0	BDL
ETHYL BENZENE	5.0	BDL
METHYLENE CHLORIDE	5.0	BDL
1,1,2,2-TETRACHLOROETHANE	5.0	BDL
TETRACHLOROETHENE	5.0	BDL
TOLUENE	5.0	BDL
1,1,1-TRICHLOROETHANE	5.0	BDL
1,1,2-TRICHLOROETHANE	5.0	BDL
TRICHLOROETHENE	5.0	BDL
TRICHLOROFLUOROMETHANE	5.0	BDL
VINYL CHLORIDE	10.0	BDL
XYLENES	5.0	BDL
INTERNAL STANDARD RECOVERY		
FLUOROBENZENE		104%
1-CHLORO,2-BROMO PROPANE		118%

BDL - BELOW DETECTION LIMIT.

FEDERAL REGISTER, VOL 49, NO. 209, OCTOBER 26, 1984.

IF A DILUTION IS NEEDED TO DETERMINE THE ANALYTES, THE DETECTION LIMIT  
HAS BEEN INCREASED BY THAT DILUTION FACTOR.

CERTIFIED BY

  
LINK THROWER

8-16-91RE

LAW & COMPANY  
W0-1/WO-3  
51184-85  
AUGUST 16, 1991

BASE NEUTRAL/ACIDS  
METHOD 8270  
DATE ANALYZED: 8-05-91  
DATE EXTRACTED: 8-01-91  
CLIENT ID: W0-1

PART A  
BASE NEUTRAL

PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
ACENAPHTHENE	200	BDL
ACENAPHTHYLENE	200	BDL
ANTRACENE	200	BDL
BENZO(A)ANTHRACENE	200	BDL
BENZO(B)FLUORANTHENE	200	BDL
BENZO(K)FLUORANTHENE	200	BDL
BENZO(GHI)PERYLENE	200	BDL
BIS(2-CHLOROETHYL)ETHER	200	BDL
BIS(2-CHLOROETHOXY)METHANE	200	BDL
BIS(2-ETHYLHEXYL)PHTHALATE	200	BDL
BIS(2-CHLOROISOPROPYL)ETHER	200	BDL
4-BROMOPHENYL PHENYL ETHER	200	BDL
BUTYL BENZYL PHTHALATE	200	BDL
2-CHLORONAPHTHALENE	200	BDL
4-CHLOROPHENYL PHENYL ETHER	200	BDL
CHRYSENE	200	BDL
DIBENZO(A,H)ANTHRACENE	200	BDL
DI-N-BUTYLPHTHALATE	200	BDL
1,2-DICHLOROBENZENE	200	BDL
1,3-DICHLOROBENZENE	200	BDL
1,4-DICHLOROBENZENE	200	BDL
3,3'-DICHLOROBENZIDINE	200	BDL
DIETHYL PHTHALATE	200	BDL
DIMETHYL PHTHALATE	200	BDL
2,4-DINITROTOLUENE	200	BDL
2,6-DINITROTOLUENE	200	BDL
DI-N-OCTYLPHTHALATE	200	BDL
FLUORANTHENE	200	BDL
FLUORENE	200	BDL
HEXACHLOROBENZENE	200	BDL
HEXACHLOROBUTADIENE	200	BDL
HEXACHLOROETHANE	200	BDL
IDENO(1,2,3-CD)PYRENE	200	BDL
ISOPHORONE	200	BDL
2-METHYLNAPHTHALENE	200	BDL
NAPHTHALENE	200	BDL
NITROBENZENE	200	BDL
N-NITROSODI-N-PROPYLAMINE	200	BDL
PHENANTHRENE	200	BDL
PYRENE	200	BDL
1,2,4-TRICHLOROBENZENE	200	BDL

LAW & COMPANY  
W0-1/W0-3  
51184-85  
AUGUST 16, 1991

BASE NEUTRAL/ACIDS  
METHOD 8270  
CLIENT ID: W0-1  
CET SAMPLE: 51184

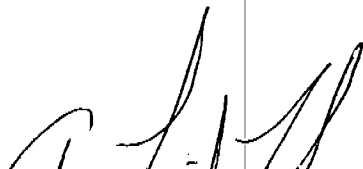
PART B  
ACIDS

PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
4-CHLORO-3-METHYLPHENOL	200	BDL
2-CHLOROPHENOL	200	BDL
2,4-DICHLOROPHENOL	200	BDL
2,4-DIMETHYLPHENOL	200	BDL
2,4-DINITROPHENOL	200	BDL
2-METHYL-4,6-DINITROPHENOL	200	BDL
2-NITROPHENOL	200	BDL
4-NITROPHENOL	200	BDL
PENTACHLOROPHENOL	200	BDL
PHENOL	200	BDL
2,4,6-TRICHLOROPHENOL	200	BDL

BDL - BELOW DETECTION LIMIT

FEDERAL REGISTER, VOL 49, NO. 209, OCTOBER 26, 1984

J - Indicates an estimated value. This flag is used when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit.



LAW & COMPANY  
W0-1/W0-3  
51184-85  
AUGUST 16, 1991

BASE NEUTRAL/ACIDS  
METHOD 8270  
CLIENT ID: W0-3  
CET SAMPLE: 51185

PART B  
ACIDS

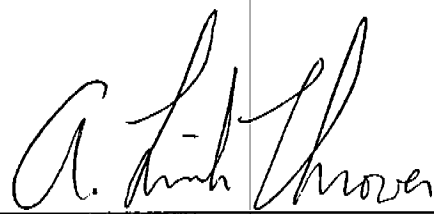
PARAMETER	DETECTION LIMIT (ug/kg)	RESULTS (ug/kg)
4-CHLORO-3-METHYLPHENOL	200	BDL
2-CHLOROPHENOL	200	BDL
2,4-DICHLOROPHENOL	200	BDL
2,4-DIMETHYLPHENOL	200	BDL
2,4-DINITROPHENOL	200	BDL
2-METHYL-4,6-DINITROPHENOL	200	BDL
2-NITROPHENOL	200	BDL
4-NITROPHENOL	200	BDL
PENTACHLOROPHENOL	200	BDL
PHENOL	200	BDL
2,4,6-TRICHLOROPHENOL	200	BDL

BDL - BELOW DETECTION LIMIT

FEDERAL REGISTER, VOL 49, NO. 209, OCTOBER 26, 1984

J - Indicates an estimated value. This flag is used when the mass spectral data indicated the presence of a compound that meets the identification criteria but the result is less than the specified detection limit.

CERTIFIED BY

  
LINK THROWER

APPENDIX 6

TANK FARM ANALYTICAL RESULTS

1711 Castle Street • P.O. Box 629 • Wilmington, North Carolina 28402  
Telephones (919) 762-7082 or (919) 762-8956  
FAX (919) 762-8785

CUSTOMER: ENSCI Corporation

PROJECT ID: Burlington Industries

[illegible]

Bruce Roswell 7-9-91 8:30am

Received by: (Signature)

Date/Time

Relinquished by: (Signature)

Received by: (Signature)

Date/Time

Received for Laboratory by:

Richard Crowell

Date/Time

17/10/91 1330

### Conditions upon receipt

Remarks:

600

**LAW & COMPANY**  
*Consulting and Analytical Chemists*

ESTABLISHED 1903

Main Office  
1711 Castle Street  
P.O. Box 629  
Wilmington, N.C. 28402

REPORT DATE: 7-24-91

919-762-7082 919-762-8956  
FAX 919-762-8785

ENSCI INC.  
1108 OLD THOMASVILLE ROAD  
HIGH POINT, N.C. 27263

DATE RECEIVED: 7-17-91  
DATE COLLECTED: 7-10-91  
COLLECTED BY: B. BRASWELL  
LAB I.D. # EW 7817

SAMPLE DESCRIPTION: SOIL - BURLINGTON INDUSTRIES

TESTS/SAMPLES	UNITS	D1-1	D1-2	D1-3	D2-1	D2-2
TOTAL PETROLEUM HYDROCARBON	PPM	<10*	<10*	<10*	<10*	<10*

TESTS/SAMPLES	UNITS	D2-3	D <sup>2</sup> ? B3-1	D3-2	D3-3	G1-1
TOTAL PETROLEUM HYDROCARBON	PPM	<10*	<10*	<10*	<10*	---
GLYCOL	PPM	---	---	---	---	<5

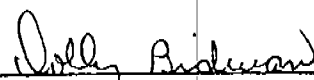
TESTS/SAMPLES	UNITS	G1-2	G2-1	G2-2	O1-1	O1-2
GLYCOL	PPM	<5	<5	<5	---	---
HEAVY OIL	PPM	---	---	---	<10*	<10*

TESTS/SAMPLES	UNITS	O2-1	O2-2
HEAVY OIL	PPM	<10*	<10*

EPA METHOD # 3550 GAS CHROMATOGRAPH (TPH)  
EPA METHOD # 9071 (HEAVY OIL)

DETECTION LIMITS = 10 PPM

\* BELOW DETECTION LIMITS

  
LABORATORY DIRECTOR

ESTABLISHED 1903

**FAX (919) 762-8785**

## CHAIN OF CUSTODY RECORD

CUSTOMER: ENSCI Corporation

PROJECT ID: Burlington Industries, Burlington

**SAMPLERS (Signature)**

Brew Braswell

SAMPLE NUMBER	SAMPLE LOCATION	DATE	TIME	SAMPLE TYPE			NO. OF CONT.	ANALYSIS REQUIRED
				WATER		SOIL		
				COMP	GRAB			
<del>Diesel</del>	<del>Soil Stockpile - Diesel</del>	<del>7/12</del>	<del>6:02</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>4</del>	<del>3550, 9020, BTEX</del>
<del>Oil</del>	<del>Soil Stockpile - Waste Oil</del>	<del>7/12</del>	<del>6:05</del>	<del>✓</del>	<del>✓</del>	<del>✓</del>	<del>4</del>	<del>9031, 8240, 8270, 1012, 1013, 1014, 1015, 1016, 1017, 1018, 1019, 1020, 1021, 1022, 1023, 1024, 1025, 1026, 1027, 1028, 1029, 1030, 1031, 1032, 1033, 1034, 1035, 1036, 1037, 1038, 1039, 1040, 1041, 1042, 1043, 1044, 1045, 1046, 1047, 1048, 1049, 1050, 1051, 1052, 1053, 1054, 1055, 1056, 1057, 1058, 1059, 1060, 1061, 1062, 1063, 1064, 1065, 1066, 1067, 1068, 1069, 1070, 1071, 1072, 1073, 1074, 1075, 1076, 1077, 1078, 1079, 1080, 1081, 1082, 1083, 1084, 1085, 1086, 1087, 1088, 1089, 1090, 1091, 1092, 1093, 1094, 1095, 1096, 1097, 1098, 1099, 1100, 1101, 1102, 1103, 1104, 1105, 1106, 1107, 1108, 1109, 1110, 1111, 1112, 1113, 1114, 1115, 1116, 1117, 1118, 1119, 1120, 1121, 1122, 1123, 1124, 1125, 1126, 1127, 1128, 1129, 1130, 1131, 1132, 1133, 1134, 1135, 1136, 1137, 1138, 1139, 1140, 1141, 1142, 1143, 1144, 1145, 1146, 1147, 1148, 1149, 1150, 1151, 1152, 1153, 1154, 1155, 1156, 1157, 1158, 1159, 1160, 1161, 1162, 1163, 1164, 1165, 1166, 1167, 1168, 1169, 1170, 1171, 1172, 1173, 1174, 1175, 1176, 1177, 1178, 1179, 1180, 1181, 1182, 1183, 1184, 1185, 1186, 1187, 1188, 1189, 1190, 1191, 1192, 1193, 1194, 1195, 1196, 1197, 1198, 1199, 1200, 1201, 1202, 1203, 1204, 1205, 1206, 1207, 1208, 1209, 1210, 1211, 1212, 1213, 1214, 1215, 1216, 1217, 1218, 1219, 1220, 1221, 1222, 1223, 1224, 1225, 1226, 1227, 1228, 1229, 1230, 1231, 1232, 1233, 1234, 1235, 1236, 1237, 1238, 1239, 1240, 1241, 1242, 1243, 1244, 1245, 1246, 1247, 1248, 1249, 1250, 1251, 1252, 1253, 1254, 1255, 1256, 1257, 1258, 1259, 1260, 1261, 1262, 1263, 1264, 1265, 1266, 1267, 1268, 1269, 1270, 1271, 1272, 1273, 1274, 1275, 1276, 1277, 1278, 1279, 1280, 1281, 1282, 1283, 1284, 1285, 1286, 1287, 1288, 1289, 1290, 1291, 1292, 1293, 1294, 1295, 1296, 1297, 1298, 1299, 1300, 1301, 1302, 1303, 1304, 1305, 1306, 1307, 1308, 1309, 1310, 1311, 1312, 1313, 1314, 1315, 1316, 1317, 1318, 1319, 1320, 1321, 1322, 1323, 1324, 1325, 1326, 1327, 1328, 1329, 1330, 1331, 1332, 1333, 1334, 1335, 1336, 1337, 1338, 1339, 1340, 1341, 1342, 1343, 1344, 1345, 1346, 1347, 1348, 1349, 1350, 1351, 1352, 1353, 1354, 1355, 1356, 1357, 1358, 1359, 1360, 1361, 1362, 1363, 1364, 1365, 1366, 1367, 1368, 1369, 1370, 1371, 1372, 1373, 1374, 1375, 1376, 1377, 1378, 1379, 1380, 1381, 1382, 1383, 1384, 1385, 1386, 1387, 1388, 1389, 1390, 1391, 1392, 1393, 1394, 1395, 1396, 1397, 1398, 1399, 1400, 1401, 1402, 1403, 1404, 1405, 1406, 1407, 1408, 1409, 1410, 1411, 1412, 1413, 1414, 1415, 1416, 1417, 1418, 1419, 1420, 1421, 1422, 1423, 1424, 1425, 1426, 1427, 1428, 1429, 1430, 1431, 1432, 1433, 1434, 1435, 1436, 1437, 1438, 1439, 1440, 1441, 1442, 1443, 1444, 1445, 1446, 1447, 1448, 1449, 1450, 1451, 1452, 1453, 1454, 1455, 1456, 1457, 1458, 1459, 1460, 1461, 1462, 1463, 1464, 1465, 1466, 1467, 1468, 1469, 1470, 1471, 1472, 1473, 1474, 1475, 1476, 1477, 1478, 1479, 1480, 1481, 1482, 1483, 1484, 1485, 1486, 1487, 1488, 1489, 1490, 1491, 1492, 1493, 1494, 1495, 1496, 1497, 1498, 1499, 1500, 1501, 1502, 1503, 1504, 1505, 1506, 1507, 1508, 1509, 1510, 1511, 1512, 1513, 1514, 1515, 1516, 1517, 1518, 1519, 1520, 1521, 1522, 1523, 1524, 1525, 1526, 1527, 1528, 1529, 1530, 1531, 1532, 1533, 1534, 1535, 1536, 1537, 1538, 1539, 1540, 1541, 1542, 1543, 1544, 1545, 1546, 1547, 1548, 1549, 1550, 1551, 1552, 1553, 1554, 1555, 1556, 1557, 1558, 1559, 1560, 1561, 1562, 1563, 1564, 1565, 1566, 1567, 1568, 1569, 1570, 1571, 1572, 1573, 1574, 1575, 1576, 1577, 1578, 1579, 1580, 1581, 1582, 1583, 1584, 1585, 1586, 1587, 1588, 1589, 1590, 1591, 1592, 1593, 1594, 1595, 1596, 1597, 1598, 1599, 1600, 1601, 1602, 1603, 1604, 1605, 1606, 1607, 1608, 1609, 1610, 1611, 1612, 1613, 1614, 1615, 1616, 1617, 1618, 1619, 1620, 1621, 1622, 1623, 1624, 1625, 1626,</del>

Relinquished by: (Signature)

Ben Beaswell 7-16-91

**Received by: (Signature)**

**Date/Time**

**Relinquished by: (Signature)**

**Received by: (Signature)**

Date/Time

Relinquished by: (Signature)

Received by: (Signature)

Date/Time

### Methods of Shipment

Received for Laboratory by:

Date/Time

**Conditions upon receipt**

Remarks:

Good

100,000

# LAW & COMPANY

*Consulting and Analytical Chemists*  
ESTABLISHED 1903

1711 Castle Street • P.O. Box 629 • Wilmington, North Carolina 28402  
Telephones (919) 762-7082 or (919) 762-8956  
FAX (919) 762-8785

## CHAIN OF CUSTODY RECORD

CUSTOMER: ENVSC Corporation

PROJECT ID: Burlington Industries, Burlington

SAMPLERS (Signature) Bruce Braswell

SAMPLE NUMBER	SAMPLE LOCATION	DATE	TIME	SAMPLE TYPE			NO. OF CONT.	ANALYSIS REQUIRED
				WATER COMP	GRAB	SOIL		
GZ-2	#2 Glycol Tank	7/10	6:29			✓	2	Glycol
O1-1	#1 Oil Tank	7/10	6:35			✓	2	9071
O1-2	#1 Oil Tank	7/10	6:35			✓	2	9071
O2-1	#2 Oil Tank	7/10	6:40			✓	2	9071
O2-2	#2 Oil Tank	7/10	6:42			✓	2	9071

Relinquished by: (Signature) <u>Bruce Braswell 7-16-91</u>	Received by: (Signature)	Date/Time
Relinquished by: (Signature)	Received by: (Signature)	Date/Time
Relinquished by: (Signature)	Received by: (Signature)	Date/Time
Methods of Shipment	Received for Laboratory by: <u>Richard Braswell</u>	Date/Time <u>7-16-91 1330</u>
Conditions upon receipt <u>Good</u>	Remarks:	

APPENDIX 7

DOCUMENTATION OF THE 1986 UNDERGROUND  
PIPING SYSTEM FAILURE AND SUBSEQUENT CLEAN-UP

Date: Apr-26, 1986

CORPORATE SPILL/EVENT RECORD & CHECKLIST

→ Seal - pls file in  
Spill book  
thanks,  
mss

1. Spill/Event Location: GARAGE  
Plant Name B-I-TRANSPORTATION - BURLINGTON  
Physical Location of Event/Spill \_\_\_\_\_

2. Call Reported By: DEAN FORTUNE Phone No.: \_\_\_\_\_

3. Call Received By: Tom Moore at home

4. Date Call Received: 4-26-85 Time: 10:00 AM.

5. Date Spill/Event Occurred: 4-26-85 Time: 8:00 AM.

6. a. What was event? Ruptured OIL LINE  
b. What was spilled? (Spills Only)  
Oil? MOTOR OIL #50 WT. GEAR How much? < 55 gal.  
Hazardous Substance? NO How much? \_\_\_\_\_  
Other? \_\_\_\_\_ How much? \_\_\_\_\_

7. Did spill reach? (Spills Only)  
Sanitary Sewer? NO How much? \_\_\_\_\_  
Storm Drain? NO How much? \_\_\_\_\_  
Stream/River? NO How much? \_\_\_\_\_  
Pond/Lagoon? NO How much? \_\_\_\_\_  
Waste Treatment Plant? NO How much? \_\_\_\_\_  
Other (Describe)? \_\_\_\_\_

LINES IN REACH  
FUEL  
ANTI-FREEZE  
" " MIX  
85-140 OIL  
50 WT. OIL  
15W40 OIL

8. Has spill/event been reported to?  
Div. Management? YES Who? TYLER Phone# \_\_\_\_\_ When? 4-26  
Eng. Management? YES Who? MOORE Phone# \_\_\_\_\_ When? 4-26  
Public Relations? \_\_\_\_\_ Who? \_\_\_\_\_ Phone# \_\_\_\_\_ When? \_\_\_\_\_  
Local Authorities? \_\_\_\_\_ Who? \_\_\_\_\_ Phone# \_\_\_\_\_ When? \_\_\_\_\_  
State Authorities? YES Who? DEAN RALPH Phone# \_\_\_\_\_ When? 4-28  
EPA? NO Who? \_\_\_\_\_ Phone# \_\_\_\_\_ When? \_\_\_\_\_  
Coast Guard? NO Who? \_\_\_\_\_ Phone# \_\_\_\_\_ When? \_\_\_\_\_

9. What caused the spill/event? RUSTED PIPE - UNDER GROUND  
Describe: \_\_\_\_\_

10. Has the spill/event been resolved or contained? YES - Contained  
Describe measures: Cleaned soil and contained soil

11. Is outside assistance required? NO - Used "oil dry" and straw.  
Explain: We are using a plumbing contractor to restore pipe and soil.

12. Has operations/production been curtailed/halted/impaired? NO -  
Describe: \_\_\_\_\_

13. Has local/state/federal representative visited site or planning to visit site?  
Explain, who, when: yes - 4-30-86 - said it appeared OK.

-> Jule 1985  
book. Thanks,  
MBF

Mr. James Staton - Burlington Garage

April 28, 1986

Porter Lowdermilk /jgh - Corporate Engineering

L. Smith - Burl.Garage

M. Schwenn - Engr

Oil Line Failure  
Burlington Terminal

On Saturday, April 26, 1986, an oil line failed and caused oil seepage into the ground and to the surface on the east side of the garage area.

Associated Plumbing of Burlington was called in immediately to excavate and make temporary repairs to this line.

It appears that all of the contaminated soil has been excavated and permission is being obtained to take this soil to the Burlington landfill. It appears that approximately less than 50 gals. of oil escaped from the system and that this oil was contained within a relatively small area at the point of line failure.

There are seven lines in a common ditch coming from the underground tanks to an outside pit prior to entry into the garage area. I inspected the lines and it is difficult to determine the exact condition of these lines; however, for the age of the lines (approximately 18 years), the lines appear to be in reasonably good condition. There was some external pitting and it would be very difficult to make a positive statement as to future failure of these lines.

In discussing the repair methods with Mr. Gene Kimrey of Associated Plumbing, we only have two options without taking the complete line out of the ground and replacing.

1. Install a full wrap neoprene stainless steel clamp over the failed pipe.
2. Take out a full 20' section of existing pipe and replace at the screwed fittings.

Based on the close condition of the pipe and past experience with full wrap clamps, it is our opinion that the full wrap clamp will perform just as well as replacing the line. Mr. Kimrey indicated he will do further investigation of the pipe and let us know the condition of the pipe for final method of repairs at that time.

You are to have Associated Plumbing to handle disposing of the excavated material, and then the hole is to be filled with compacted crusher run stone prior to repaving the ditch with asphalt paving.

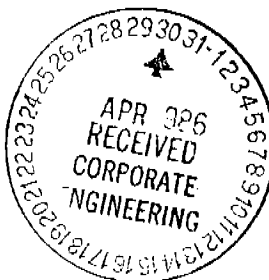
Please advise if you have any questions regarding these recommendations.

7-11-86 10:00 AM  
4/28/86

# Burlington Interoffice Memorandum



To: Mary Schwenn - 3330 Engineering  
From: Deane Fortune/gjr - Safety  
Subject: OIL SPILL



Date: 4/29/86

CC to:

At approximately 10:00 a.m. on Saturday, April 26, one of the shop employees noted some oil coming up through the pavement at the east end of the Burlington Shop building. All of the switches controlling the oil flow were shut off and some oil dry and straw was spread over the area where the oil was leaking. At that point, none of the oil had gotten into a storm sewer or any type water way.

A plumber was called in and with the use of a small backhoe, started digging down through the pavement where the oil was exposed and we found that the pipe carrying 50 weight gear oil from the underground storage tank into the shop building, had developed a leak. We apparently lost less than 100 gallons of oil. The plumber used the backhoe to expose the leak and remove the contaminated soil from the general area of the leak. The soil was not contaminated more than six to eight inches under the pipe due to the fact that the soil is so hard underneath the pipe and, of course, the oil was allowed to come to the top because its filled on top of the pipes. All of the cleanup debris was placed in empty 55-gallon drums and set inside the building so it would not get rained on or cause any further pollution. The dirt that was removed from the hole is covered by a plastic cover.

Corporate Engineering was called to examine the pipes and make their recommendations as to repairs. You should receive a copy of their recommendations.

I contacted the Alamance County Fire Marshall, the local health department, and they in turn are going to ask the state authorities for permission for us to bury the cleanup residue in the local landfill. I also contacted the state environmental people in Raleigh and made a report to them. As soon as permission is granted for disposal of the material, it will be disposed of according to the instructions we received.

It does not appear at this time that we should have any problem with polluting any water source or causing any other environmental problems; however, should anything further arise, I will advise.

Brenda Smith from the State Water Control office will inspect the spill area in the p.m. of 4/30/86.



State of North Carolina  
Department of Natural Resources and Community Development  
Winston-Salem Regional Office

James G. Martin, Governor

DIVISION OF ENVIRONMENTAL MANAGEMENT

S. Thomas Rhodes, Secretary

Groundwater Section

May 8, 1986

Mr. Deane Fortune  
Burlington Industries  
Transportation Division  
P. O. Box 691  
Burlington, NC 27215

Dear Mr. Fortune:

SUBJECT: NOTICE OF VIOLATION  
BURLINGTON INDUSTRIES - TRANSPORTATION DIVISION  
BURLINGTON  
ALAMANCE COUNTY.

The North Carolina General Statutes authorize and direct the Environmental Management Commission of the Department of Natural Resources and Community Development to protect and preserve the water and air resources of the State. The Division of Environmental Management has the delegated authority to enforce adopted pollution control rules and regulations.

An investigation of an oil discharge was made on April 30, 1986, at Burlington Industries - Transportation Division, Alamance County.

As you were informed by Jennifer Gentry of the Division, such leakage is a violation of G. S. 143-215.75 et. seq. Oil Spill and Hazardous Substances Control Act and 15 NACA 2L Classifications and Water Quality Standards applicable to the Groundwaters of North Carolina. A violation of G. S. 143-215.75 et. seq. is subject to civil penalties of up to \$5,000 as authorized by G. S. 143-215.91(a). A violation of NCAC 15 2L is subject to civil penalties of up to \$10,000 as authorized by G. S. 143-215.6(1)a.

Mr. Deane Fortune

Page 2

May 8, 1986

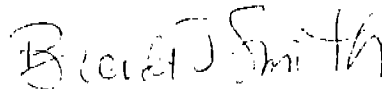
I have determined that an assessment of a civil penalty for the above noted violations will not be made at this time. However, I want you to clearly understand the serious nature of the oil leak which resulted in the violation. In conjunction with your responsibility to abate the contamination, you are directed to submit the following to the Winston-Salem Regional Office at 8003 North Point Boulevard, Winston-Salem, NC 27106.

1. A written report stating the nature of the leak to include:

- (1) volume of product lost
- (2) extent of contamination
- (3) results of all remedial actions taken to date

If you have any questions concerning this matter, feel free to contact our office at (919) 761-2351.

Sincerely,



Brenda J. Smith  
Hydrogeological Regional Supervisor

BJS/dh

cc: Groundwater Files (2)

0  
book - replaces  
existing letter on same sub,  
Shanks,  
ms3

**B. I. Transportation, Inc.**

A Subsidiary of Burlington Industries, Inc.  
5/20/86

Box 691

Burlington, North Carolina 27216-0691

Ms. Brenda J. Smith,  
Hydrogeological Regional Supervisor  
North Carolina Department of Natural  
Resources & Community Development  
8003 North Point Blvd.  
Winston-Salem, NC 27106-3295

Dear Ms. Smith:

The following is furnished concerning our recent oil spill, and  
pursuant to your letter of May 8, 1986:

The oil spill occurred at approximately 9:30 a.m. on 4/26/86 at the  
east end of our Burlington maintenance facility. The spill was the  
result of one of the delivery pipes between the tank and the pump  
deteriorating. We lost less than 100 gallons of heavy-weight gear oil.  
The contamination did not reach a distance of more than two feet into  
the soil anywhere away from the leak with the exception of rising from  
the pipe up through the ground. As you are probably aware, the  
Alamance County soil does not leak any type liquid very well. All of  
the contaminated soil was removed and disposed of in accordance with  
instructions from the Alamance County Health Department. The ruptured  
pipe has been repaired and we are now in the process of making the  
determination as to what action is going to be taken to preclude any  
ground contamination in the future. We will, as soon as possible,  
replace all of the delivery pipes. They will not be underground but  
will be above ground in a protected environment.

We certainly appreciate the cooperation of your office and if we can be  
of any further assistance, please advise.

Sincerely,

C. Deane Fortune, C.D.S.  
Safety Engineer

gjr